



July 8, 2013

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: In the Matter of Technology Transitions Policy Task Force Regarding  
Potential Trials GN Docket No. 13-5; In the Matter of Policies to Respond  
to the Ongoing Technological Transition of Voice Networks GN Docket  
No. 12-353

Dear Ms. Dortch,

On behalf Asian Americans Advancing Justice | AAJC<sup>1</sup> (Advancing Justice), we submit comments in support of all-Internet Protocol (IP) network trials.

Advancing Justice is dedicated to promoting a fair and equitable society for all by working for civil and human rights and empowering Asian Americans and other underserved communities. We provide the growing Asian American community with multilingual support and culturally appropriate legal services, community education, and public policy and civil rights advocacy. In the communications field, AAJC works to promote universal access and reduce barriers to critical technology, services, and the media.

The transition of our nation's communications from time-division multiplexing (TDM) to all-IP networks is an important step in modernizing communications for all Americans. Asian Americans in particular stand to benefit greatly from the transition to an all-IP network, including greater connectivity to IP-enabled services, health outcomes, educational opportunities, and economic opportunities.<sup>2</sup>

Although the IP-transition has many benefits, it is important for the Commission to “promote investment and innovation while protecting consumers, promoting competition, and ensuring that emerging all-[IP] networks remain resilient.”<sup>3</sup>

---

<sup>1</sup> As of June 20, 2013, Asian American Justice Center (AAJC) officially finished its process of aligning more closely with our affiliates in Chicago, L.A. and San Francisco, and we have adopted a shared name: Asian Americans Advancing Justice. Our affiliate name is Asian Americans Advancing Justice | AAJC, which builds upon the legacy of AAJC.

<sup>2</sup> See Comments of Asian American Federation, Asian American Justice Center *et al.*, GN Docket No. 12-253 (Jan. 28, 2013) (“Asian American Comments”).

<sup>3</sup> In the Matter of Technology Transitions Policy Task Force Regarding Potential Trials, GN Docket No. 13-5 (rel. May 10, 2013), at 1; *see also* Asian American Comments at 4 (“[W]e urge the Commission to adopt a modern and adaptive regulatory approach that not only recognizes changing technologies and

Advancing Justice also submits the following comments regarding unique issues that Asian Americans face during the transition. Regarding the transition from wireline to wireless service, trials are necessary to identify technical issues that may arise due to the change of technology. Initial reports indicate that certain capabilities once available on wireline services are no longer available or impaired on wireless services such as data services, collect calls, and certain forms of international calling.<sup>5</sup> By identifying these technical issues, service, device, and application providers can begin to develop solutions to ensure customers and businesses continue to have a fully functioning communications services regardless of the underlying technology.

International calling capabilities and the use of calling cards are especially important to Asian American and other immigrant communities who rely heavily on international calling to stay in touch with relatives overseas. According to a study conducted for the Carnegie Foundation in 2003, 59 percent of immigrants in the United States reported telephoning their family and/or friends in their native country weekly or several times each month.<sup>6</sup> Evidence shows that high levels of Asian immigrants particularly engage in such transnational activity—making international calls, especially through phone cards, to their families, relatives, and friends on a monthly, weekly, or even daily basis.<sup>7</sup> For example, Asian-born people living in the San Francisco area spend an average of \$100 per-month on long-distance and international telephone phone calls; and more than one-third of Chinese-born U.S. immigrants allocate almost half of their monthly long-distance budget to international calls.<sup>8</sup>

Special attention should be paid to ensure culturally sensitive and appropriate outreach is made to low income individuals and those with limited English proficiency as well as persons with disabilities. Consumer protection should be central during the transition. Accordingly the entire trial process must be transparent for consumers. Customers should be given adequate notice of impending trials and clearly informed of differences between wireline and wireless services. Consumer education and outreach plans should also be developed and monitored as part of the trials.

---

promotes innovation and investment, but also protects consumers, encourages competition, and ensures universal access for all communities.”

<sup>5</sup> Public Notice at 9 n.32.

<sup>6</sup> Steve Farkas, Ann Duffett & Jean Johnson, *Now That I'm Here: What America's Immigrants Have to Say about Life in the U.S. Today*, PUBLIC AGENDA 59 (Jan. 2003), [http://www.publicagenda.org/files/now\\_that\\_im\\_here.pdf](http://www.publicagenda.org/files/now_that_im_here.pdf).

<sup>7</sup> Robert J. Shapiro & Nam D. Pham, *Maintaining Contact: The Provision of International Long-Distance Service For Low-Income Immigrants in the United States*, SONECON 4 (Nov. 2006), [http://www.sonecon.com/docs/studies/mc\\_1106.pdf](http://www.sonecon.com/docs/studies/mc_1106.pdf) (citing *Hispanic & Asian Marketing Communication Research*, CHINESE AND VIETNAMESE CONSUMER PROFILE (1997)); PYONG GAP MIN, ASIAN AMERICANS: CONTEMPORARY TRENDS AND ISSUES 308, (Pyong Gap Min, 2nd ed. 2006), *available at* [http://books.google.com/books?id=5PSYZMs8TzEC&pg=PA308&lpg=PA308&dq=study+on+prepaid+calling+cards+asian+immigrants&source=bl&ots=I\\_HsTZgSx9&sig=NWtYluWItPkS5AFWaPCx7DijDms&hl=en&sa=X&ei=GIzUUZAd5v3gA-i\\_geAM&ved=0CEUQ6AEwBQ#v=onepage&q=study%20on%20prepaid%20calling%20cards%20asian%20immigrants&f=false](http://books.google.com/books?id=5PSYZMs8TzEC&pg=PA308&lpg=PA308&dq=study+on+prepaid+calling+cards+asian+immigrants&source=bl&ots=I_HsTZgSx9&sig=NWtYluWItPkS5AFWaPCx7DijDms&hl=en&sa=X&ei=GIzUUZAd5v3gA-i_geAM&ved=0CEUQ6AEwBQ#v=onepage&q=study%20on%20prepaid%20calling%20cards%20asian%20immigrants&f=false).

<sup>8</sup> Shapiro & Pham, *supra* note 7, at 4.



Thank you for your consideration on this very important topic. Please do not hesitate to contact Jason T. Lagria, Advancing Justice Senior Staff Attorney, at 202-296-2300 ext. 122 if you have any questions or comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jason Lagria".

Jason T. Lagria  
Senior Staff Attorney  
Media and Telecommunications  
Asian Americans Advancing Justice | AAJC

